Multi-Media Compliance Inspection

United States Postal Service
Baltimore Vehicle Maintenance Facility
60 W. Oliver St.
Baltimore, Maryland 21201-5783

Date of Inspection: November 24, 2003

EPA Representatives:	Gerard W. Crutchley Environmental Protection Specialist (410) 305-2780
	Jose Jimenez Environmental Engineer EPA, Region III, Federal Facility Co-ordinator (215) 814-2148
Maryland Department of the Environment Representative:	Frank Ciurca Water Resources Engineer (410) 537-3521
Facility Representatives:	Leonard Peters Manager, Vehicle Maintenance (410) 625-8930
	Donald Powell Supervisor, Vehicle Supplies (410) 625-8929

Background

The EPA, Region III's Office of Enforcement Compliance and Environmental Justice (OECEJ) Facilities Enforcement Program requested that a multi-media compliance inspection be conducted at the United States Postal Services's Baltimore Vehicle Maintenance Facility. The inspection was assigned to Gerard Crutchley, Environmental Protection Specialist, OECEJ at Fort Meade, Maryland. The planning and coordination of the inspection were accomplished by both Gerard Crutchley and Jose Jimenez, Region III, Federal Facility Coordinator. The inspection was scheduled for November 24, 2003.

Prior to the scheduled date for the inspection, Mr. Jimenez contacted the Maryland Department of the Environment (MDE) to provide them with notification of the upcoming inspection. Mr. Jimenez spoke with Mr. Bernard Penner, Director of Special Programs. Mr. Penner, upon receiving notification, provided the information regarding the inspection to applicable State program offices within MDE and solicited their participation in the inspection.

On November 19, 2003, Mr. Jimenez provided official notification to the United States Postal Service that a multi-media compliance inspection would be conducted at their vehicle maintenance facility beginning November 24, 2003. The notification was made in the form of a telephone call and a notification letter (See Attachment No. 1). The notification letter included a request for the facility to have available for review, at the time of the inspection, records and documents required by the environmental statutes that would be addressed during the inspection (See Attachment No. 2).

Very little background information regarding the facility was available prior to the subject inspection. EPA, Region III had never inspected the facility and therefore there was no information on file with EPA. The EPA inspector spoke with inspectors from MDE's hazardous waste program and water program prior to the inspection, but both indicated that MDE did not have any information regarding the subject facility on file in their respective offices. The EPA inspector did obtain a copy of a facility report for the facility from EPA's IDEA data base. This report indicated that the facility had two RCRA I.D. numbers, but was classified as a conditionally exempt small quantity generator. The report also indicated that the facility had an air permit. A copy of the report is provided as an attachment (See Attachment No. 3).

An inspector, Frank Ciurca, with MDE's Water Program contacted Mr. Crutchley and indicated that he would accompany EPA during the inspection.

Prior to the subject inspection, the EPA team leader, Gerard Crutchley, was contacted by Mr. Leonard Peters, Manager, Vehicle Maintenance. While discussing the upcoming inspection, Mr. Peters provided some information regarding the subject facility. Specifically, he stated that the facility is a conditionally exempt small quantity generator. They generate very little hazardous waste, if any. Mr. Peters also said that they do not have any above ground storage tanks or underground storage tanks. Mr. Peters said that all of their underground tanks were removed in 1997/1998.

Inspection Activities/Observations

The EPA and State inspectors arrived at the subject facility on November 24, 2003 at

1000 and met with Mr. Leonard Peters and Mr. Donald Powell, Supervisor, Vehicle Supplies. The EPA inspectors presented their credentials to Mr. Peters identifying them as authorized representatives of EPA. The EPA inspectors provided Mr. Peters and Mr. Powell with a brief description of EPA Region III's Federal Facility Compliance Program and why the facility was selected for a multi-media inspection. The EPA team leader, Gerard Crutchley then provided facility personnel with a brief description of the scope of the subject inspection.

The EPA inspectors then asked Mr. Peters to provide a description of the subject facility, including the type of work that is performed on site and the waste materials that are generated as a result of the work. The facility, located at 60 W. Oliver St in Baltimore, was constructed in 1962. It has been a vehicle maintenance facility since that time. The facility comprises approximately 3.3 acres and consists of one large maintenance building. The facility employs approximately 36 people. They operate five days per week with a day and an evening shift. They also operate limited hours on the weekends. A listing of the employees and the hours worked is provided as an attachment to this report (See Attachment No. 5).

This facility is part of the U. S. Postal Service's VP Capital Metro Area. Mr. Peters as the manger for vehicle maintenance, oversees four facilities. The main facility located at 60 W. Oliver St, and three other vehicle maintenance facilities (Halethorpe, Parkville and Columbia). Each of the other three facilities operates independently of the main facility in terms of environmental management (e.g., they each have their own RCRA I.D. Nos.) and according to Mr. Peters there is no transfer of regulated waste materials between facilities. Mr. Peters did provide the inspectors with an organizational chart for the VP Capital Metro Area (See Attachment No. 4).

Mr. Peters said that the facility provides full maintenance services for approximately 1400 vehicles. These vehicles include tractor trailers, smaller cargo vans, small postal delivery vehicles, referred to as LLVs (long life vehicles), and some passenger type vehicles (sedans). Mr. Peters described the facility as generally a preventive maintenance type facility. They do normal type maintenance such as oil changes, tires, brakes, etc. Mr. Peters said they do some body work, including painting, but this does not comprise a large part of their normal workload. Mr. Peters said that only about 80 of the 1400 vehicles that they service are equipped with air conditioning. Mr. Peters said that any servicing of these units is contracted out and none is performed on site.

The facility does not have any vehicle fueling capability. According to Mr. Peters, the facility did have underground fuel tanks but they were all taken out of service and removed around 1998. Fueling facilities for U.S. Postal Service vehicles are currently located at another location in Baltimore City.

While conducting normal maintenance work, the facility does generate a number of waste materials including used oil, used anti-freeze, oil filters, trash, scrap metal, waste water, floor washer sediment, part washer filters, brake washer residue, spent sand from a sand blast unit, used absorbent material and spent filters from the paint booth.

According to Mr. Peters, the facility does not generate any hazardous waste. The facility at one time did use part washers that contained hazardous solvents, however they have since been changed over to non-hazardous part washers. The facility maintains a hand written log book in

which they record all shipments of waste materials from the site (hazardous and non-hazardous). The shipments recorded in the log book date back to at least 1998. After reviewing a number of the entries in the log book the EPA inspector, Gerard Crutchley, noted that the last recorded shipment of hazardous waste from the site was in September 1999 (72 lbs. paint gun cleaning solvent). The facility did ship a mixture of gasoline and water off site twelve days prior to the subject inspection, which, according to Mr. Peters, was shipped as hazardous waste. However, Mr. Peters went on to say that this was a one time event resulting from the recent flooding during Hurricane Isabel when one of the vehicles at the site was flooded. Later during the inspection, the EPA inspector noted that the material in question was 85 gallons of gasoline and water which was shipped to A & A Environmental, however the material was classified as a non-RCRA waste material to be recycled. A copy of the shipment manifest for this waste is provided as an attachment to this report (See Attachment No. 6).

In June 2003, the facility had hired Weston Solutions Inc. to sample and characterize five different waste streams generated at the facility. The five waste streams are floor washer sediment, spent part washer filters, brake washer residues, sand from the sand blaster and used absorbent material. All five waste streams were analyzed for the RCRA characteristics, ignitability, corrosivity, and TCLP RCRA Characteristics. The analytical results from these samples indicated that the aforementioned materials were non-hazardous. A copy of the analytical report from Weston Solutions is attached to this report (See Attachment No. 7).

The facility does generate wastewater from a vehicle washing area. Mr. Peters said the facility has a waste water discharge permit issued by the City of Baltimore. According to Mr. Peters, the waste water from the wash area drains to an oil/water separator unit located inside of the building and he thinks that the water from that unit discharges to the sanitary sewer system.

On the day of the inspection, but prior to the start of the inspection, the State inspector, Frank Ciurca, while waiting for the inspection to begin had observed some water running from the garage bay area of the facility across the parking area behind the building into a storm drain. At the beginning of the inspection, Frank Ciurca asked facility personnel if they had a storm water permit. According to information provided by Mr. Peters, the facility did at one time have a storm water permit. In February 2000, an Environmental Compliance Coordinator, Mr. Richard Hass, at the Postal Service's main office in Baltimore sent a *No Exposure Certification for Exclusion from NPDES Storm Water Permitting* to the Maryland Department of the Environment for the four vehicle maintenance facilities located in the Baltimore area (including the subject facility). A copy of the certification is attached to this report (See Attachment No. 8). The MDE acknowledged receipt of the exclusion and responded to the facility in a letter dated February 28, 2000 (See Attachment No. 9). Based on this, the Postal Service did not renew their storm water permit which expired in November 2002.

The State inspector, Frank Ciurca, told facility personnel that facilities that store vehicles for maintenance or other activities are not exempt from the General Industrial Storm Water Permitting requirements and required to have a storm water permit and a storm water pollution prevention plan. Mr. Ciurca informed facility personnel that within fourteen days they must obtain coverage under a General Industrial Permit and within thirty days develop a storm water pollution prevention plan. This information is documented in the inspection report written by Mr. Ciurca (See Attachment No. 10).

During the subject inspection the EPA inspector, Gerard Crutchley, completed a multi-media screening checklist. A copy of the completed checklist is attached to this report. Information regarding the various media programs discussed during the inspection are as follows:

RCRA, Subtitle C, Hazardous Waste

As previously stated, it appears that the facility does not generate any hazardous waste on a regular basis. The facility at one time used hazardous solvents in their part washing units, but have since switched to a non-hazardous solvent. The last recorded shipment of hazardous waste from the facility was in September 1999. The facility does have a paint spray gun cleaning station that uses a solvent that would be considered hazardous if disposed of as a waste, however the unit is equipped with an evaporator unit that recovers the used solvent from the cleaning unit. The facility is listed in EPA's IDEA database as a Conditionally Exempt Small Quantity Generator.

RCRA, Subtitle I, Underground Storage Tanks

At the time of the subject inspection, the facility did not have any underground storage tanks as defined at 40 CFR Part 280.12. The facility did at one time have fifteen underground storage tanks. By 1999, all of these were either removed from the ground or closed in place. During the inspection, the facility representatives provided the EPA inspectors with copies of Certificates of Closure for the Underground tanks and a copy of a letter from the Maryland Department of the Environment indicating that all of the tanks had been removed and that ten monitoring wells which had been installed to monitor groundwater could be abandoned because of the absence of liquid phase hydrocarbons in samples collected from these wells (See Attachment No. 11). Mr. Peters said that all of the monitoring wells have been closed out (concreted over). The facility could not locate any other tank closure records during the subject inspection.

Wetlands

There were no wetlands observed near the facility.

Spill Prevention, Control and Countermeasures (SPCC)

The only oil stored at the subject facility is in 55 gallon drums (new and used oil). As previously stated all of the underground storage tanks have been removed or closed in place. Mr. Peters said that they did at one time have a 275-gallon aboveground tank for storing new motor oil, however that tank was removed approximately five years ago.

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

The facility does not apply pesticides. According to Mr. Peters they have a contract with a pest control company (Atlantic Pest Control) who comes in on a quarterly basis to spray for pest control.

Clean Air Act

The facility does have an air permit issued by the State of Maryland for their paint spray booth (permit # 24-6-1502 N). The permit contains specific limitations for the volatile organic compound (VOC) content of various paints/coatings that may be used by facilities for vehicle refinishing. During the subject inspection, the facility personnel provided the EPA inspector with a copy of their permit limitations and also a copy of a sales report which indicates the paints/coatings purchased by the facility and their VOC content (See Attachment No. 12).

During the subject inspection, the EPA inspector asked facility personnel if they could identify the category of coating that each of the paint/coating products listed on the sale report belonged to so that a comparison could be made between the VOC content of the coatings versus the permit limitations. The sales report appears to be a listing of all paint/coating products purchased by the facility from January 2002 thru November 2003.

Subsequent to the inspection, the EPA inspector, Gerard Crutchley, made a simple comparison of the VOC contents of the paints/coatings on the sales report with the VOC permit limitations. Based on the comparison, it appears that the facility did use paints/coatings with a higher VOC content then is allowed by the permit.

As an example, an acrylic lacquer thinner listed on the sales report has a VOC content of 6.80 lbs/gal. This product was categorized as a topcoat and according to the limitations on the permit, topcoats have an allowable limit of 5.0 lbs/gal. The EPA inspector did contact the facility to confirm this information. The EPA inspector spoke with Mr. Donald Powell, who said that he did not know for sure, but after speaking with their painter, Mr. Larry Wheeler, it is possible that the products on the sales report were mis-classified and if properly classified they might not exceed the permit limitations. Mr. Powell also said that he thinks that the painters do use thinner in the paint before application.

The EPA inspector, Gerard Crutchley, asked facility personnel if there was any asbestos in the facility's building. Mr. Peters said that an asbestos/lead/radon survey was conducted at the facility in 1996. The report from that survey states that 27 bulk samples were collected of suspected asbestos containing building materials. Analytical results confirmed that asbestos was not present in any of the samples. However, the report goes on to say that some pipe insulation and fire proof doors are assumed to contain asbestos. According to Mr. Peters there has not been any removal of asbestos containing materials in the last eighteen months. A portion of the survey report is provided as an attachment to this report (See Attachment No. 13).

As previously stated in this report, the facility does not do any servicing work involving air conditioning systems in their vehicles, Mr. Peters said that all servicing work of systems containing refrigerants is conducted off site by a contractor.

Toxic Substances Control Act (PCBs)

The EPA inspector, Gerard Crutchley, asked facility personnel if they use any equipment (e.g., transformers, capacitors, hydraulic systems) that contain PCBs. Mr. Peters replied that all of the electrical power is supplied by Baltimore Gas & Electric and they do not have any oil filled electrical equipment. The facility does have hydraulic floor lifts, but the facility has no reason to suspect that the hydraulic fluid contains PCBs. The facility did provide a copy of the MSDS sheet for the hydraulic fluid which confirms that PCBs are not present in the fluid (See

Attachment No. 14).

Following the discussions with facility personnel, the EPA and State inspectors accompanied by Mr. Peters and Mr. Powell toured the subject facility to observe all areas of the facility and all of the maintenance activities. The observations noted in each of the areas toured are as follows:

Outside on the west side of the building, the inspectors observed a concrete island in a covered driveway area (See Photo Nos. 1 & 2). The concrete island was the location of the dispenser pumps for the underground fuel tanks that were once in use at the facility. Adjacent to the covered driveway area, the inspectors observed a large 40-yard roll off container. The facility personnel indicated that the roll off was used to accumulate scrap metal. The EPA inspectors noted that the roll off did contain pieces of scrap metal (car parts). The roll off container can be seen in Photo No. 5.

Behind the building is a large parking area for postal service vehicles. In the parking area, approximately 100 feet behind the building is a storm drain (See Photo No.3). There are six service/garage bays along the back of the maintenance building facing the parking area. At the time of the inspection, the pavement in the parking area was noticeably wet from three of the service bay doors down to the storm drain in the parking area. The wet pavement is depicted in Photo Nos. 4, 5, 6 & 8. This runoff from the service bays into the storm drain is what prompted the State inspector to question facility personnel about a storm water discharge permit. When questioned about the source of the runoff, facility personnel indicated that it was wash water from the vehicle washing bay (See Photo No. 7) and water from pressure washers in bays # 1 & 2. After some discussion, it was recommended to facility personnel that some type of containment be placed across the service/garage bay door to prevent any wash water from flowing outside onto the pavement and eventually to the storm drain.

According to the State inspector, Frank Ciurca, when he first observed this runoff prior to the inspection, he noted that it appeared to contain some oil and anti-freeze. Mr. Peters said that the service bays were washed out towards the bay doors, when they should have been washed towards the floor drains in the interior of the building. The observations noted by Frank Ciurca are documented in his inspection report (See Attachment No. 10).

The inspectors observed that the vehicle wash bay was designed with drains in the floor to direct the wash water to a sump, from which, it is pumped to the floor drainage line connected to one of the floor drains inside of the building (See Photo No. 9). The inspectors then moved to the other end of the shop area to observe the oil/water separator unit which was located in the floor of the building. The facility personnel removed the metal cover over the separator unit and the inspectors observed a square box type sump approximately 4 ½ to 5 feet deep (See Photo No. 10). The bottom of the area appeared to be covered with dirt. After closer examination, it was determined that the bottom of the square area was actually a metal cover for the separator unit (See Photo No. 11). There was a series of floor drains in the shop area which, according to facility personnel, drain to the oil/water separator unit (See Photo No. 12). When asked about the discharge from the oil/water separator unit, facility personnel did not know if it drained to the sanitary sewer system or to the storm water system. There was no documentation (e.g., schematics, etc.) available at the time of the inspection to confirm if the discharge drained to the sanitary or the storm water system. The inspectors recommended to facility personnel that they

conduct a dye test to determine the discharge point of the oil/water separator unit. The inspectors also recommended that the facility have someone service the separator unit to determine that it was operating properly

Subsequent to the inspection, the EPA inspector had contacted the facility with some follow up questions from the inspection and was told by Mr. Peters that they had hired a company to conduct a dye test of the floor drains and oil/water separator unit and the results of the test confirmed that the separator unit drained to the sanitary sewer system. The EPA inspector, Gerard Crutchley, asked Mr. Peters to provide a copy of the results to EPA.

The inspectors observed the facility's paint spray booth. The booth is equipped with an air circulation system that contains 40 exhaust filters (See Photo No. 13) and 8 intake filters. The person working in the area at the time of the inspection, Mr. Larry Wheeler, said that they change out the filters about every six months. Mr. Wheeler said that they dispose of the filters as regular trash. The EPA inspectors asked Mr. Peters if the filters had ever been tested to determine if they were hazardous. Mr. Peters said that the filters had never been analyzed for hazardous characteristics. The inspectors told facility personnel that they should have the filters tested to properly classify them as either hazardous or non-hazardous waste.

The EPA inspector asked Mr. Wheeler how they clean their paint spray equipment. Mr. Wheeler pointed to a paint gun washer and recycling unit (See Photo No. 14). He said all of the equipment is cleaned in this unit. The used thinner is then pumped to an evaporator unit (See Photo No. 15) which heats the thinner to remove any residue and paint pigment and the clean thinner is then recycled back to the cleaning unit for reuse. According to facility personnel, they have not had to dispose of any waste from this process.

Following the tour of the subject facility, the inspectors returned to Mr. Peters office to discuss RCRA Section 6002 requirements regarding the use of re-refined oils and lubricants, retread tires and engine coolants. The EPA inspector briefly explained to facility personnel that Executive Order 13101 (Greening the Government Through Waste Prevention, Recycling and Federal Acquisition) signed by President Clinton in 1998, directed EPA (under Section 403 of the order) to develop guidance for inspections of Federal Facilities to determine compliance with the buy-recycled program established under Section 6002 of RCRA.

The EPA inspector completed the inspection checklist for motor vehicle maintenance facilities which provides information on the use, by the facility, of re-refined oils and lubricants, retread tires and engine coolants. Based on the information received from facility personnel while completing the checklist it appears that the facility is aware of the requirements to purchase and use the aforementioned products. The facility generally does use these products and in the few instances where they do not use these products it is because they are not available or vehicle manufacturer specifications prohibit the use of the products. A completed copy of the checklist is attached to this report. The completed checklist was also forwarded to EPA, Region III's Waste and Chemical Management Division, State Programs Branch (Mike Giuranna & Howard Heim).

The EPA inspector also provided a copy of a Comprehensive Procurement Guidelines checklist to facility personnel, instructing them to complete the checklist and return it to EPA within a two-week period. This checklist provides information regarding the facility purchasing

and use of a number of different products, including construction products, non-paper office products, paper and paper products and various miscellaneous products.

This checklist is intended solely to assist inspectors in structuring an inspection and to help them ensure that common regulatory issues are not overlooked. It is not necessarily intended to represent an accurate record of the inspector's findings or observations. Notations and other comments on the checklist are not always to be viewed as direct observations by the inspector or actual fact, but may instead reflect claims by facility personnel or tentative responses which require further investigation for confirmation.

U.S. Environmental Protection Agency
Region III
Multi-Media Screening Checklist

Program	Check if Evaluated	Check if Facility is Subject to Program
Resource Conservation and Recovery Act (RCRA)	✓	
Underground Storage Tanks	✓	
Wetlands	✓	
Spill Prevention, Containment and Countermeasure (SPCC)	✓	
Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)	✓	
Air	✓	
Toxic Substances Control Act (TSCA) - PCB	✓	
TSCA - Core	✓	
Water	✓	
Emergency Planning and Community Right-to-Know Act (EPCRA) (SARA - Title III)	✓	

General Information 11/24/03

FACILITY NAME UNITED STATES POSTAL SERVICE
BALTIMORE VEHICLE MAINTENANCE FACILITY

ADDRESS 60 W. OLIVER ST. BALTIMORE, MD. 21201-5783
(Street) (City) (State) (Zip)

CONTACT LEONARD PETERS, MANAGER, VEHICLE MAINTENANCE

PHONE NUMBER (410) 625-8930 (SIC CODE) 4311

DESCRIPTION OF FACILITY OPERATIONS The facility is the main vehicle maintenance facility for the U.S. Postal Services VP Capital Metro Area.

NUMBER OF EMPLOYEES 36

LATITUDE _____ LONGITUDE _____

INSPECTORS NAME GERARD CRUTCHLEY

SIGNATURE Gerard Crutchley

TITLE ENVIRONMENTAL PROTECTION SPECIALIST

DATE 11/24/03

NOTES: **This checklist is single sided to allow space on reverse side to record additional information.**

It is probably most efficient to combine, to the extent possible, the observational needs required for this checklist with those of the media specific inspection during one general tour of the facility. It may behoove the inspector to complete this checklist before making any tour of the facility so that he/she can better identify what needs to be looked at.

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) - HAZARDOUS WASTE

11/24/03

Regional Contact: Carol Amend **Phone:** 814-5430

1. **Ask** - Does the facility have an EPA RCRA ID Number?

   ✓ Yes _____ No If yes, provide MDD 980707483

2. **Ask** - Has the facility submitted a Part A or Part B RCRA permit application? _____ Yes X No

   If yes, describe _____

3. **Ask** - What are the hazardous wastes that the facility is generating?

   it appears that the facility is no longer generating any hazardous waste (last hazardous waste shipment Sept. 1999)

4. **Ask** - What is the total quantity (kilograms/month) of hazardous waste generated?

   N/A

5. **Ask** - Has the facility classified its waste as hazardous based on test results or knowledge of process?

   N/A (some waste streams analyzed, results indicated non-hazardous)

6. **Ask** - Are hazardous wastes accepted from other facilities for storage, treatment, or disposal? If yes, list those facilities.

   NO

7. **Observe** - Are there any tanks or drums containing waste material? If yes, describe (i.e., physical condition, labels/ markings, secondary containment, spills/ leaks, open containers and approximate numbers). Indicate how long the waste has been stored in tanks or containers?

   NO

8. **Observe** - Have any waste materials been dumped into pits, lagoons, etc. or placed on the ground in piles or landfills? If yes, list the waste material, approximate quantities and when and where it was dumped.

NO

9. **Observe** - Are any waste materials being burned for energy recovery? If yes, describe the units in which burning occurs.

NO

10. **Ask** - To see copies of manifests for the last year. Take a copy of a representative manifest for each type of waste. Don't worry about what it says, just copy it and all the attachments.

UNDERGROUND STORAGE TANKS (USTs) 11/24/03

REGIONAL CONTACT: Carol Amend **Phone:** 814-5430

1. **Ask** - Are there any underground storage tanks?
   _____ Yes __X__ No

2. **Ask** - Approximately how many? What are the contents? (wastes, virgin petroleum, or chemicals)

   all tanks were removed or closed in place prior to the inspection

3. **Ask/Observe** - What type of leak (release) detection is used (see next page for possible methods)? Does the facility have records showing that the method is, in fact, still in use?

   Tanks: N/A

   Piping: N/A

4. **Ask/Observe** - Have tanks been upgraded for spill and overfill protection and are steel tanks provided with cathodic protection against corrosion? _____ Yes _____ No
   N/A

5. **Observe** - Is there any evidence of leaks, spills, broken piping, broken fill/vent lines, or leaking pumps joints or valves? Provide location and description.

   N/A

6. **Ask** - Have the USTs been registered with the appropriate State agency? _____ Yes _____ No If so, request a copy of the registration form. N/A

UST CLOSURE

Closure of USTs must be performed according to regulation. If USTs are being closed, a notification of closure should be filed with the appropriate State agency 30 days prior to actual closure. Also, a site assessment should be performed.

1. **Ask/Observe** - Have any tanks been permanently closed/removed since registration form was submitted? __X__ Yes _____ No

   -If so, was notification of closure submitted to State?

   __X__ Yes _____ No

*** Methods of Release Detection for USTs:**

- Tank Tightness Testing and Inventory Control
- Automatic Tank Gauging System
- Interstitial Monitoring
- Groundwater Monitoring
- Manual Tank Gauging
- Vapor Monitoring
- Statistical Inventory Reconciliation

* **Methods of Release Detection for Piping:**

- Pressurized (P): Automatic flow restrictor; Automatic shutoff device, Continuous alarm system and Annual line testing

- Suction (S): Line testing every 3 years

* **Spill/Overfill Prevention:**

- Catchment Basins -and- .Automatic Shutoff Devices -or-
  .Overfill Alarms -or-
  .Ball Float Valves

WETLANDS 11/24/03

REGIONAL CONTACT: Jeffery Lapp
Phone Number: 814-2717

1. **Observe** - Are there any wet areas near the facility with wetland-type vegetation (cattails, rushes, sedges) that have been disturbed by waste disposal, excavation, or filling?

NO

- if yes - did facility obtain a federal Section 404 permit or any state or local permit authorizing the alteration?

N/A

SPILL PREVENTION, CONTAINMENT AND COUNTERMEASURE (SPCC)

11/24/03

REGIONAL CONTACT: David Wright

Telephone Number: 814-3293

1. **Ask/Observe** - Does the facility store oil above and/or below ground? _____ Yes __X__ No

2. **Ask/Observe** - Does the facility store more than 660 gallons in a single tank or more than 1320 gallons in a number of tanks above ground or more than 42,000 gallons below ground?
_____ Yes _____ No

   If yes, describe:

   the facility has only 55 gallon drums on site for new & used oils.

3. **Ask/Observe** - Does the facility have an SPCC (Spill prevention, Containment and Countermeasure) plan on hand?
_____ Yes _____ No N/A

4. **Ask/Observe** - Does the facility have a certified (engineers seal affixed) plan? _____ Yes _____ No N/A

   If yes, was it signed by a registered professional engineer?
_____ Yes _____ No

   When was it last updated? N/A

5. **Ask** - Has there been any major changes to oil storage at the facility since the last modification of the plan?
_____ Yes _____ No N/A

   If yes, describe:

6. **Observe** - What type of secondary containment is used at the facility? Were there any deficiencies in the secondary containment (cracks, breaks, dikes left open)? Is it adequate to contain the entire contents of the largest tank?

   N/A

7. **Ask** - Has the facility been identified, either through a self-selection process or by determination of the Regional Administrator, as one that could cause substantial harm to the environment ? _____Yes _____No N/A

Some criteria that apply are total storage capacity ≥42,000 gal. and performs overwater oil transfers to or from vessels **OR** total storage capacity ≥1,000,000 gal and one of the following: (1) inadequate secondary containment for ASTs, (2) reportable spills ≥10,000 gal within the past 5 years, (3) located in an environmentally sensitive area, or (4) one where a discharge would shut down a public drinking water intake.

If yes, answer the following: N/A

- Was a facility response plan prepared?
  _____ Yes _____ No

- Was the plan approved by EPA? _____ Yes _____ No

FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT (FIFRA)

11/24/03

REGIONAL CONTACT: Harry Daw
TELEPHONE: 814-3244

1. **Ask/Observe** - Does the facility manufacture or distribute any pesticides? _____ Yes __X__ No

2. **Ask** - If yes, what is the establishment's EPA FIFRA registration number?

N/A

3. **Ask/Observe** - Where are these materials stored?

N/A

4. **Ask/Observe** - Does the facility apply pesticides?
_____ Yes __X__ No

5. **Ask** - If yes, what is the registration number of the pesticide?

N/A

AIR: STATIONARY SOURCE COMPLIANCE

11/24/03

AIR CONTACT: Chris Pilla
814-3438

1. **Observe** - Is opaque smoke being emitted from a smokestack (dark enough not to observe anything behind the plume)?
_____ Yes __X__ No

   - If yes - which process unit(s) is emitting the opaque smoke (be specific, i.e., Boiler No. 4, incinerator, etc.)?

N/A

2. **Observe** - Describe areas where fugitive emissions (both gaseous and visible) are likely to occur (includes emissions from treatment systems, open top tanks, valves, flanges, etc.)

paint spray booth area

3. **Ask/Observe** - Do any of the process units have any air pollution control equipment to control emissions?
__X__ Yes _____ No

If yes, describe process/equipment:

filter system in the paint booth

   - Is any air pollution control equipment out of service?
_____ Yes __X__ No

   - If yes, when will it be back on line?

N/A

4. **Ask/Observe** - Does the facility have any coating* operations?
__X__ Yes _____ No paint spray booth

   - If yes, obtain list of coatings and lb/gal VOC content. Are these water-based or solvent based coatings?

See Attachment No. 12

- Are emissions from coating process lines controlled?

  X Yes _____ No

  If yes, describe control devices:

  filter system

5. **Ask/Observe** - Has the facility added any processes or expanded any pre-existing processes since 1980? _____ Yes X No

   - If yes, describe any state or federal air permits obtained (operating; PSD**)?

     N/A

6. **Ask/Observe** - Is there any asbestos on site? _____ Yes _____ No not sure, but it is assumed there is some asbestos containg building materials on site.

7. **Ask/Observe** - Is the facility undergoing or has the facility undergone any renovations or demolitions during the last 18 months which involve the removal or disturbance of asbestos-containing materials? _____ Yes X No

   If yes, describe how much asbestos (square feet or linear feet) was removed, where it was located and other details:

   N/A

8. **Ask** - If asbestos was removed was notification provided to the State and EPA? _____ Yes _____ No N/A

* Refers strictly to paints, lacquors, varnishes and inks and not to electroplating/metal finishing processes.

** Prevention of Significant Deterioration

9. **Ask/Observe** - Does the facility handle/emit any of the National Emission Standards for Hazardous Air Pollutants (NESHAP) chemicals other than asbestos (mercury, beryllium, vinyl chloride, benzene, arsenic, radionuclides)?
   _____ Yes X No

   If yes, describe process:

_____

_____

_____

10. **Ask/Observe** - Does the facility perform any service/maintenance on any type of refrigeration equipment involving a refrigerant? _____ Yes __X__ No

If yes, answer the following:

- Does the facility have an EPA certified technician? _____ Yes _____ No N/A

  (If yes, get a copy of the certification card/certificate)

- Does the facility own and operate refrigerant recovery equipment? _____ Yes _____ No N/A

  (If yes, get the model and serial number of the equipment)

- Does the facility have a file copy of its equipment registration that was sent to EPA? _____ Yes _____ No N/A

- Does the facility have any refrigeration units with refrigerant charges of 50 lbs or greater? _____ Yes _____ No N/A

- What have been the leak rates on these larger units for the last three years? _____

- Does the facility keep all maintenance records for all units of 50 lbs or greater? _____ Yes _____ No N/A

- Are leaks above the allowable leak rate (35%/ year) repaired within 30 days, or 120 days if an industrial process shut down is required? _____ Yes _____ No N/A

- If the leaks have been repaired, was a follow-up verification test conducted before the refrigerant was recharged into the system? _____ Yes _____ No N/A

- If no repairs were conducted or repairs failed, was a retrofit or retirement plan prepared and available for review? _____ Yes _____ No N/A

11. **Ask/Observe** - Does the facility own and operate a dry clean machine? _____ Yes __X__ No

If yes, answer the following:

- Did this facility file an initial notification with EPA? _____ Yes _____ No N/A

- Did this facility file a pollution prevention compliance report with EPA? _____ Yes _____ No N/A

- Did this facility file a Control Compliance Report with EPA? _____ Yes _____ No N/A

- How much perchloroethylene was purchased during each calender year?

  1997 _____
  1996 _____ N/A
  1995 _____

- Does the facility maintain purchasing records for these purchases of perchloroethylene? _____ Yes _____ No N/A

- Who is the facility's current perchloroethylene supplier?

  Name:
  Phone Number: N/A

- Obtain the following information for each dry cleaning machine: name of manufacturer, model #, serial #, and date installed. N/A

- Does the facility have an O&M manual for each of its dry-cleaning machines? _____ Yes _____ No N/A

- Does the facility maintain leak detection and repair logs? _____ Yes _____ No N/A

- Does the facility have control equipment to control the perchloroethylene (perc) emissions? _____ Yes _____ No

  If yes, describe: N/A

  _____

  _____

TOXIC SUBSTANCES CONTROL ACT (TSCA) - PCB 11/24/03

REGIONAL CONTACT: AQUANETTA DICKENS **TELEPHONE:** 814-2080

1. **Ask/Observe** - Does the facility use equipment (i.e., transformers, capacitors, hydraulic/heat transfer systems, etc.) that contains PCBs? _____ Yes __X__ No

   - If yes, does the facility have analysis indicating the concentration of PCBs or is PCB status based on nameplate information?

     N/A

   - Is equipment labelled (yellow labels) _____ Yes _____ No N/A

2. **Ask/Observe** - Does the facility store PCBs on site?

   - If yes, describe storage area (including containment provisions) and its location and whether area itself and items stored there are labelled

     N/A

3. **Ask** - How long were items in storage?

   N/A

4. **Observe** - Is there any evidence of PCB spills or leaking PCB equipment? _____ Yes _____ No N/A

   If yes, describe:

5. **Ask** - If facility uses PCB transformer(s) (PCB >500 ppm), have they been registered with the local fire department?
   _____ Yes _____ No N/A

6. **Ask** - Does the facility prepare annual documents for its PCBs
   _____ Yes _____ No N/A

7. **Ask** - Does the facility perform quarterly inspections of its PCB transformers? _____ Yes _____ No N/A

TSCA CORE

1. **Ask** - Does the facility manufacture or import chemicals?
   _____ Yes ___X___ No

   If yes, answer the following question:

2. **Ask** - Are chemical substances used <u>solely</u> for foods, drugs, or pesticide purposes? _____ Yes _____ No
   N/A
   If no, answer the following questions:

3. **Ask** - What are the names and Chemical Abstract Service Registration Numbers (CASRN) of the chemical substances and what are their end uses, annual production and/or imported volumes (pounds)?

   N/A

4. **Ask** - Has the facility ever submitted Inventory Updating Reports (IUR) under TSCA to EPA? _____ Yes _____ No
   N/A

5. **Ask** - Does the facility have a working research and development laboratory (i.e., more than a simple QC lab?)
   _____ Yes _____ No N/A

6. **Ask** - Has the facility ever submitted a Pre-Manufacturing Notification (PMN) under TSCA to the EPA? _____ Yes _____ No

   If yes, describe: N/A

<u>NOTE:</u> **Attached to this checklist are two copies of a TSCA Notice of Inspection and Receipt for Samples and Documents. These documents must be provided to the facility at the time of the inspection. Give one copy to the facility and retain one copy for EPA records.**

WATER 11/24/03

REGIONAL CONTACTS: Lori Reynolds - 814-5435
Karen Johnson - 814-5445

1. **Ask/Observe** - Does the facility use water in its manufacturing process? ✓ Yes _____ No

   If yes, does the facility discharge process wastewater, cooling water, stormwater, or any other pollutant into the receiving stream, municipal sewer system or a subsurface disposal system (e.g., septic tank, well, cesspool, drywell, etc.)? ✓ Yes _____ No

   If yes, describe each discharge and where it goes:

   facility uses water to wash vehicles. The runoff is supposed to drain to an oil/water seperator unit and then discharge to the sanitary sewer.

2. **Ask** - Does the facility have a permit for each of these discharges? To streams: NPDES or Stormwater To POTW: Pre-Treatment To subsurface: Underground Injection Control
   _____ Yes _____ No

(continued on 2nd page)

3. **Ask/Observe** - Does the facility treat its wastewater prior to discharging? ✓ Yes _____ No

   If yes, how? (what treatment systems are employed?

   o/w seperator unit

4. **Ask/Observe** - Is the effluent from the wastewater treatment facilities clear and free of solids? _____ Yes _____ No N/A

5. **Ask/Observe** - Does the equipment appear to be operating properly, clean and well maintained? _____ Yes _____ No N/A

6. **Observe** - Are there any unusual odors? _____ Yes ✓ No

7. **Ask/Observe** - Does the facility have floor drains in its processing or chemical storage areas? ✓ Yes _____ No

   If yes, what materials are likely to be spilled down the floor drains?

   wash water, oils/fluids from vehicles

If yes, where do the floor drains discharge (treatment facility, municipal sewer, directly to the receiving water or into the septic tank, cesspool, dry well)?

discharge to an o/w seperator then to the sanitary sewer

8. **Ask/Observe** - What is the disposal method for the wastewater sludges generated?

N/A

9. **Ask** - Is facility in compliance with discharge limitations?
_____ Yes _____ No N/A

10. **Ask** - Does the facility have a stormwater pollution prevention plan? _____ Yes ✓ No

11. **Ask** - Is the drinking water supply private or public? If private, where are the wells located?

public water

12. **Ask** - Is the drinking water sampled and analyzed for contaminants? _____ Yes _____ No N/A

If yes, are the results reported to the state or EPA?

During the inspection, wash water was observed flowing from the garage bays outside to a storm water drain.

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) SARA-TITLE III
REGIONAL CONTACT: Aquanetta Dickens/David Wright 11/24/03
TELEPHONE: 814-2080/814-3293

1. **Ask** - Has the facility had a release of a hazardous substance in excess of reportable Superfund quantities within the last year?* _____ Yes __X__ No

   If yes, what was the substance and approximate quantity?

   _____

   Was EPA/State notified? _____ Yes _____ No

   Was notification oral or written?_____

2. **Ask** - Does the facility manufacture, process, or otherwise use any toxic chemicals in a quantity greater than 10,000 lbs. per year? _____ Yes __X__ No

   If yes, identify them and approximate amounts manufactured, processed or used.

   _____

   N/A

   _____

3. **Ask** - Are any of these toxic chemicals identified among those listed as Section 313 chemicals?* _____ Yes _____ No

   _____

   N/A

4. **Ask** - Has the facility submitted any toxic chemical release forms (Form R) to EPA?

   _____

   N/A

5. **Ask** - Does the facility have a threshold planning quantity of any substance (minimum of 10,000 lbs. of a hazardous substance and/or a minimum of 500 lbs. of an extremely hazardous substance)* that requires submission of a materials safety data sheet (MSDS) to the State Emergency Response Commission (SERC) and/or the Local Emergency Planning Committee (LEPC)?
   _____ Yes _____ No

   If yes, has the facility submitted any hazardous chemical inventory forms (Tier II) to the State Emergency Response Commission and/or Local Emergency Planning Committee?

_____ Yes _____ No

6. **Ask** - Are the MSDS sheets on site? _____ Yes _____ No

N/A

* The chemicals subject to these requirements can be found in EPA publication number 560/4-92-011, January 1992, "Title III, List of Lists".

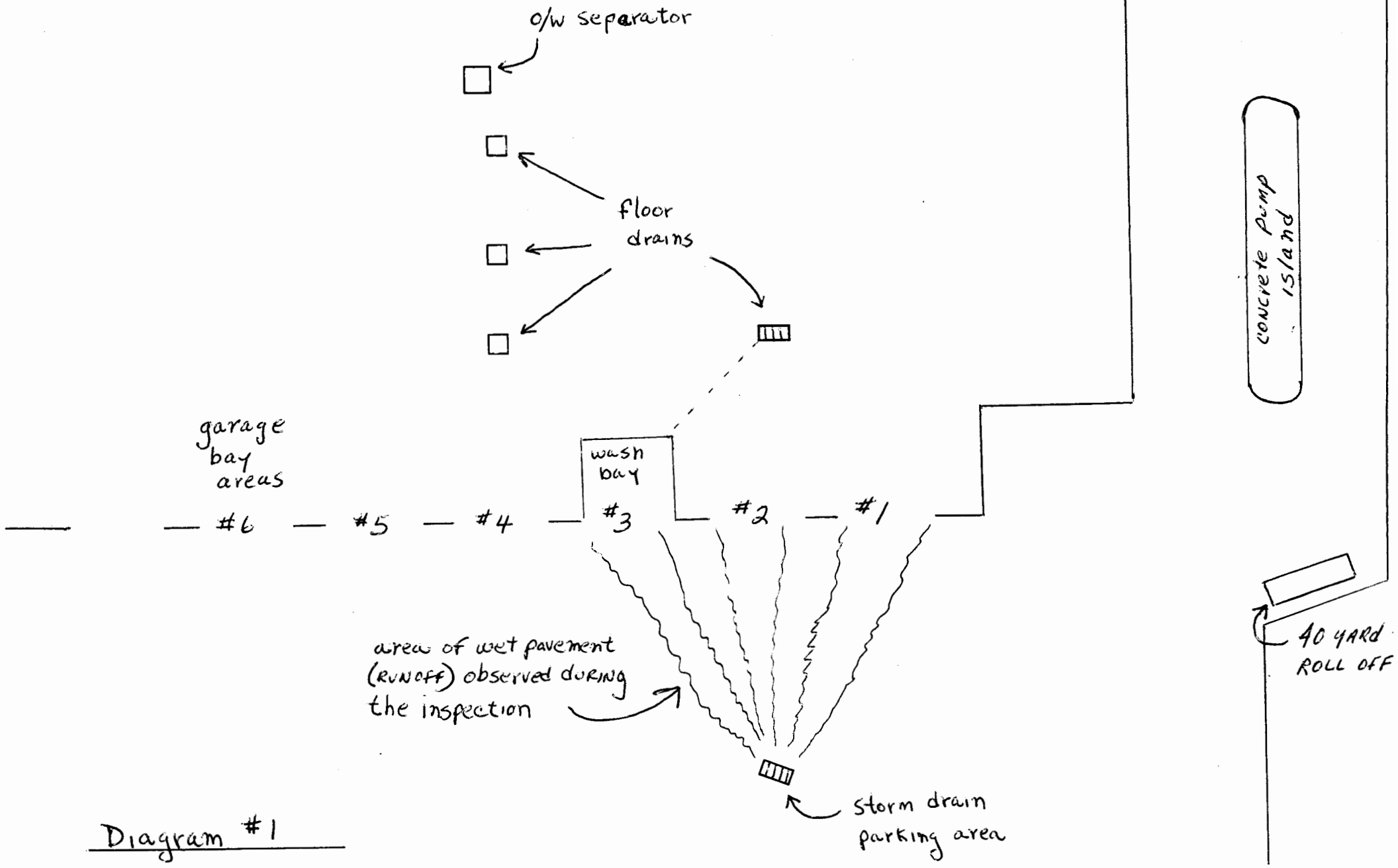

Diagram #1

USPS VEHICLE

maintenance facility

11/24/03